

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: GLEN LLEWELLYN JENKINS

CHAPTER 13

Debtor

JACK N. ZAHAROPOULOS

CHAPTER13 TRUSTEE

CASE NO: 4-23-02808-MJC

Movant

vs.

GLEN LLEWELLYN JENKINS

Respondent

**DEBTOR/RESPONDENT'S OBJECTION/RESPONSE TO TRUSTEE'S MOTION  
TO DISMISS CASE**

AND NOW, on January 17, 2024, Glen Llewellyn Jenkins, Debtor/Respondent, Pro Se, provides this objection/response to the Trustee's Motion to Dismiss Case:

1. Debtor Glen Llewellyn Jenkins (Debtor) filed his Chapter 13 Plan on this day January 17, 2024 by the stated deadline in the Trustee's Motion to Dismiss Case, by the EDSS. Further, the Debtor has completed filing of all forms and schedules currently required.
2. Please refer to Section 9, Nonstandard Plan Provisions with its Attachment in the Debtor's filed Chapter 13 Plan.
3. Further, the Debtor provides objections and responses to the Trustee's Motion to Dismiss Case below.

- a. Debtor's single major bankruptcy debt is a home mortgage loan with Carrington Mortgage Services, LLC (CMS) for his primary residence/income generating property.

The Debtor's goal in his Chapter 13 Bankruptcy case is, with the cooperation of CMS, to fully cure the arrearages of the CMS mortgage loan and resume regular, monthly mortgage payments to the lender. The Debtor notably is to pursue a loan modification package in his Plan, currently, with CMS utilizing his increased, and pending increase in income.

- b. Debtor requests of the Court a minimum 30 to 60 days postponement of actions (aside from the pending 341 Meeting of January 29, 2024) for submitting, with assistance of a pending retained, experienced, professional/legal counsel the Debtor's loan modification package to CMS.

The professional/legal counsel may continue work with CMS on Debtor's behalf on the loan modification package towards a successful end result.

Further, the Debtor requests from this Court protection during his Plan implementation from lifting of the automatic stay by CMS, and from the rescheduled Sheriff Sale of the property in Centre County on March 14, 2024, subsequent to a default mortgage foreclosure judgment on the property which occurred in October 2020 during a lockdown period of the Covid-19 Pandemic.

Dated: January 17, 2024

Respectfully submitted,

/s/ Glen Llewellyn Jenkins, Debtor Pro Se

Case No. 4:23-bk-02808

Po Box 914

State College, PA 16804-0914

g.jenkins1@yahoo.com

VERIFICATION

I verify that the statements made in this **DEBTOR/RESPONDENT'S  
OBJECTIONS/RESPONSE TO TRUSTEE'S MOTION TO DISMISS CASE**  
are true and correct. I understand that false statements herein are made subject to the  
penalties relating to unsworn falsification to authorities.

Date: January 17, 2024

/s/ Glen L. Jenkins

Glen Llewellyn Jenkins, Debtor, pro se

4:23-bk-02808

814/222-5050

g.jenkins1@yahoo.com

CERTIFICATE OF SERVICE

I, Glen L. Jenkins, Debtor pro se, hereby certify that on the 17th day of January 2024, I served the following with a true and correct copy of the **DEBTOR/RESPONDENT'S OBJECTIONS/RESPONSE TO TRUSTEE'S MOTION TO DISMISS CASE** on the following parties, via certified 1st Class mail and /or electronically:

UNITED STATES TRUSTEE  
1501 NORTH 6<sup>TH</sup> STREET  
BOX 302  
HARRISBURG, PA 17102

CLERK OF THE BANKRUPTCY COURT  
SYLVIA RAMBO U.S. COURTHOUSE  
1501 N. 6<sup>TH</sup> STREET  
HARRISBURG, PA 17102

AGATHA R. McHALE, esq.  
ATTORNEY FOR MOVANT  
JACK N. ZARAHOPOULOS  
STANDING CHAPTER 13 TRUSTEE  
SUITE A, 8125 ADAMS DRIVE  
HUMMELSTOWN, PA 17036  
email: amchale@pamd13trustee.com

I certify that the statements made in this certificate of service are true and correct.

Date: January 17, 2024

/s/ Glen L. Jenkins  
Glen Llewellyn Jenkins, Debtor, pro se  
4:23-bk-02808  
814/222-5050  
g.jenkins1@yahoo.com